

Christopher Sproul (State Bar No. 126398)
Jodene Isaacs (State Bar No. 226895)
Megan Anderson (State Bar No. 237548)
Environmental Advocates
5135 Anza Street
San Francisco, California 94121
Telephone: (415) 533-3376, Facsimile: (415) 358-5695
Email: csproul@enviroadvocates.com, jisaacs@enviroadvocates.com,
manderson@enviroadvocates.com

Daniel Cooper (State Bar No. 153576)
Layne Friedrich (State Bar No. 195431)
Lawyers for Clean Water, Inc.
1004 O'Reilly Avenue
San Francisco, California 94129
Telephone: (415) 440-6520, Facsimile: (415) 440-4155
Email: cleanwater@sfo.com, layne@lawyersforcleanwater.com

Shana Lazerow (State Bar No. 195491)
Adrienne L. Bloch (State Bar No. 215471)
Communities for a Better Environment
1440 Broadway Suite701
Oakland, California 94612
Telephone: (510) 302-0430, Facsimile: (510) 302-0438
Email: slazerow@cbecal.org, abloch@cbecal.org

Attorneys for Plaintiffs
BAYKEEPER, HUMBOLDT BAYKEEPER, ECOLOGICAL RIGHTS FOUNDATION, and
COMMUNITIES FOR A BETTER ENVIRONMENT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BAYKEEPER, HUMBOLDT BAYKEEPER,
ECOLOGICAL RIGHTS FOUNDATION, and
COMMUNITIES FOR A BETTER
ENVIRONMENT,

Plaintiffs,

V.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, STEPHEN L. JOHNSON,
as Administrator of the United States Environmental
Protection Agency, WAYNE NASTRI, as Regional
Administrator of the United States Environmental
Protection Agency, Region 9,

Defendants.

) Case No. C 06-5611 CRB
)
) Stipulated Request for an Order
) Enlarging Time for Briefing Schedule
) on Cross-Motions for Summary
) Judgment, Setting Briefing Schedule on
) Motion for Leave to Amend, and
) Rescheduling Case Management
) Conference

1
2 WHEREAS, Plaintiffs Baykeeper, Humboldt Baykeeper, Ecological Rights Foundation,
3 and Communities for a Better Environment (collectively, "Plaintiffs") filed a motion for
4 summary judgment on November 8, 2006 in this case and noticed it for hearing on December 15,
5 2006;

6 WHEREAS, pursuant to stipulation of the parties and order of the Court, Defendants
7 Stephen L. Johnson, Administrator of the United States Environmental Protection Agency; and
8 Wayne Nastri, Regional Administrator, EPA Region IX, and the United States Environmental
9 Protection Agency (collectively "EPA") were granted an extension of the deadline for filing their
10 response to Plaintiffs' motion for summary judgment until November 30, 2006;

11 WHEREAS, the same stipulation and order of the Court gave the Plaintiffs until
12 December 5, 2006 to file their reply brief in support of their motion for summary judgment;

13 WHEREAS, EPA filed an opposition memorandum to Plaintiffs' motion for summary
14 judgment and a counter-motion for summary judgment on November 30, 2006;

15 WHEREAS, Plaintiffs have requested additional time to prepare their response to EPA's
16 counter-motion for summary judgment and their reply brief in support of their motion for
17 summary judgment in light of the fact that the undersigned attorney for Plaintiffs and his co-
18 counsel have conflicts with other litigation deadlines;

19 WHEREAS, Plaintiffs intend to move for leave to file a second amended complaint and
20 the parties wish to have this motion for leave heard simultaneously with the motions for
21 summary judgment to economize the resources of the parties and the Court;

22 WHEREAS, the parties further wish to have the currently scheduled case management
23 conference consolidated with the hearing on the above-referenced motions to further economize
24 the resources of the parties and the Court;

25 NOW, THEREFORE, the parties have agreed to the following briefing and hearing
26 schedule and request that the Court issue an order as follows:

27 Stipulation for Extension of Time
28

1 Counsel for Plaintiffs

2 FOR DEFENDANTS:

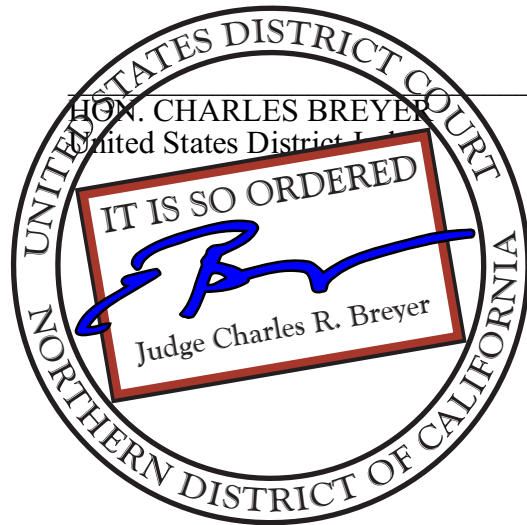
3 Kevin Ryan
4 United States Attorney

5 Sue Ellen Wooldridge
6 Assistant Attorney General
7 Environment & Natural Resources Division

8 /s/ Lily N. Chinn
9 Lily N. Chinn
10 Trial Attorney
11 United States Department of Justice
12 Counsel for Defendants

13 IT IS SO ORDERED.

14 Dated: December 6, 2006



15
16
17
18
19
20
21
22
23
24
25
26 _____
27 electronically file this stipulated motion on her behalf.

28 Stipulation for Extension of Time